

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Matthew David Missimer : CHAPTER 13
Nicole Elizabeth Missimer, :
Debtors : CASE NO. 15-11760-ref

MOTION TO CONVERT CHAPTER 13 CASE TO A CHAPTER 7

Matthew David Missimer and Nicole Elizabeth Missimer, Debtors, by and through their counsel, Brenna H. Mendelsohn, Esquire, of Mendelsohn & Mendelsohn, P.C. files this Motion to Convert debtor's instant Chapter 13 Bankruptcy to a Chapter 7 Bankruptcy and in support thereof, represents the following:

1. The debtors, Matthew David Missimer and Nicole Elizabeth Missimer, filed a Petition for relief under 11 U.S.C. Chapter 13 of the Federal Code on March 16, 2015 to case number 15-11760-ref and this case is still pending before this Honorable Court.
2. The debtors seek an Order allowing his case to be converted from a Chapter 13 to a Chapter 7 Bankruptcy.
3. The debtors no longer have the monthly disposable income to feasibly remain in a Chapter 13 Plan.

WHEREFORE, the debtors pray that this Honorable Court enter an Order allowing Debtors to convert their Chapter 13 case to a Chapter 7 case as it is the more appropriate form of relief under the circumstances.

Respectfully Submitted,

/s/ Brenna H. Mendelsohn
Brenna H. Mendelsohn, Esquire
Attorney for Debtors

Dated: August 29, 2016